IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

CHRISTIAN ALBERTO SANTOS GARCIA, et al.,

Plaintiffs,

v.

Case No. 1:20-cv-00821 (LMB/JFA)

ALEJANDRO MAYORKAS, et al.,

Defendants.

JOINT MOTION TO STAY BRIEFING AND CONTINUE THE HEARING ON MOTIONS FOR SUMMARY JUDGMENT RELATING TO COUNTS II AND III

Plaintiffs and Defendants Immigration Centers of America - Farmville, LLC and Jeffrey Crawford ("Farmville Defendants" or collectively with Plaintiffs, the "Settling Parties"), by counsel, hereby jointly move this Court to stay briefing on their motions for summary judgment related to Counts II and III of the Amended Complaint (42 U.S.C. § 1983) (the "Motions") and continue the hearing on the Motions, currently scheduled for September 10, 2021. A proposed order is attached hereto. In support of this request, the parties respectfully represent as follows:

- 1. By Joint Motion for Entry of a Briefing Schedule on Motions for Summary Judgment Relating to Counts II and III (42 U.S.C. § 1983), filed June 14, 2021, the Parties requested that the Court set a briefing schedule on their Motions. (ECF No. 183.)
- 2. By Order entered June 15, 2021, the Court set a briefing schedule on the Motions. (ECF No. 184.)
- 3. By Order entered on June 21, 2021, the Court scheduled the hearing on the Motions for September 10, 2021. (ECF No. 186.)

4. By Joint Motion for Entry of a Revised Briefing Schedule on Motions for Summary

Judgment Relating to Counts II and III, filed July 8, 2021, the parties requested that the Court

revise the previously set briefing schedule on their Motions. (ECF No. 187.)

5. By Order entered June 15, 2021, the Court set a revised briefing schedule on the

Motions. (ECF No. 188.)

6. The Settling Parties have resolved in principle all matters in this litigation as

between and among them and require a brief period of not more than thirty (30) days to effectuate

a settlement agreement.

7. Defendant Armor Correctional Health Services, Inc. does not oppose this motion.

WHEREFORE, the Settling Parties respectfully request that the briefing schedule on the

motions for summary judgment related to Counts II and III of the Amended Complaint be stayed

and that the hearing on their motions for summary judgment related to Counts II and III of the

Amended Complaint be continued.

Dated: July 23, 2021

Respectfully submitted,

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